

REMARKS

The Final Action has been carefully considered along with the cited references. In view of the foregoing claim amendments and the following remarks, it is submitted that the claims should be allowable over the cited references.

Claims 19-36 were pending in the present application. After the claim amendments are entered, claims 19, 20, 22-28, 31-33, 35, and 36 will remain pending.

The Final Action objected to claims 19 and 32 due to the missing of an indefinite article (i.e., "a") preceding the term "virtual circuit connection." Applicants have amended these two claims to correct the informality.

The Final Action also rejected all of the previously pending claims based on the art. Specifically, claims 24-27 and 29-31 were rejected under 35 U.S.C. §102(b) as being anticipated by Burwell et al. U.S. Patent 5,818,842. Claims 19-23 and 32-36 were rejected under U.S.C. § 103(a) as being unpatentable over Burwell in view of Tanenbaum ("Computer Networks, 3rd Ed.), further in view of Hamami (U.S. Patent 6,182,193), and further in view of Weaver et al. U.S. Patent 5,995,487). Claim 28 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Burwell and further in view of Sasagawa U.S. Patent 5,943,337.

Turning first to independent claims 19 and 32, these claims are directed to the way a host computer connecting a local area network and an external network sets up an association between the network address of a first device on the local area network and a virtual circuit for the first device to communicate with a second device on the external network. When the host computer receives a request from the first device for a virtual circuit connection with the second device, it saves an association between the request (e.g., as identified by the call reference value) and the network address of the first device. When the host computer later receives a virtual circuit response from the second device, it extracts a virtual circuit ID from the response and generates, based on the first association between the request and the network address of the first device, a second association between the virtual circuit ID and the network address of the first device. This second association is then saved and can be used by the host computer for delivering subsequent communications between the first and second devices through the assigned virtual circuit.

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Applicants submit that this process of establishing the association between the network address of the first device and the virtual circuit identification is not taught or suggested by the combination of the references relied upon by the Final Action. Specifically, as to independent claims 19 and 32, the Final Action acknowledged that Burwell fails to disclose saving an association of the first device with the request, but asserted that saving an association of the first device with the request is well known in the art, as shown in Hamami. Applicants submit, however, that the cited references do not provide sufficient teachings for fully developing a case of obviousness under 35 U.S.C. § 103. This is because the cited portion of Hamami (col. 2, lines 9-7) refers to the conventional ATM connection setup process by a user machine, which is substantially different from the context in which a host computer that connects a local area network and an external virtual circuit network is used to forward virtual circuit communications between a first device on the local area network and a second device on the virtual circuit network. Due to this difference, even though Hamami teaches generating a call reference value associated with the particular "call," it does not teach or suggest storing the association between the "network address" of the local area network device initiating the call and the request. Moreover, since Hamami does not teach saving that association, there is of course no teaching or suggestion in Hamami as to using the saved association between the network address of the calling device and the call reference value to generate a second association between the network address of the first device and the virtual circuit identification. The required teaching or suggestion for these limitations is also not found in Burwell or the other cited references. Since the combination of the cited references does not provide the required teaching for each of the claim limitations, it is submitted that a Section 103 rejection is not fully supported by the references, and the claimed invention should be allowable over the art relied upon by the Final Action. According, claims 19 and 32, and their dependent claims, should be allowable.

As to claims 24-31, applicants have amended independent claim 24 to include the limitation that the call deflector program first saves an association between the network address of the first device and the request, and later generates from this association and a received virtual circuit ID a second association between the network address of the first device and the virtual circuit ID. As discussed above, the combination of the references cited by the Final Action does

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not teach or suggest these limitations. Accordingly, claim 24 and those pending claims depending from it should be allowable.

Conclusion:

The application is considered in good and proper form for allowance, and the Examiner is respectfully requested to enter the amendments and pass this application to issue. If, in the opinion of the Examiner, another telephone conference would expedite the prosecution of the subject application, the Examiner is invited to call the undersigned attorney.

Respectfully submitted,



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